



*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

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BY EMAIL

Lawrence Lustberg, Esq.
Gibbons, P.C.
One Gateway Center
Newark, NJ 07102

Mary E. Mulligan, Esq.
Friedman Kaplan Seiler & Adelman LLP
7 Times Square
New York, NY 10036

Re: *United States v. Bill Hwang and Patrick Halligan, 22 Cr. 240 (AKH)*

Dear Counsel:

Pursuant to Rule 16(a) of the Federal Rules of Criminal Procedure and your respective requests for the voluntary production of certain additional information, we have prepared hard drives containing the categories of files identified below. Except where specifically noted otherwise, the discovery material provided herein are designated as Protected Information subject to the terms of the protective order entered in this matter.

The hard drives produced today contain the following materials:

- 1) Load-ready digital files and native exports obtained from execution of search warrants on various email, Bloomberg, iCloud, and Google accounts. SDNY_SWR_PROD001, SDNY_SWR_PROD002, SDNY_SWR_PROD003.

Bates Ranges	Producing Party
SDNY_SWR_0000000001-0000343756	Responsive Bloomberg Search Warrant Returns (21 Mag 9335)
SDNY_SWR_0000343757-0000344924	Responsive Apple Search Warrant Returns (21 Mag 9335)
SDNY_SWR_0000344925-0000350171	Responsive Google Search Warrant Returns (21 Mag 9335)
SDNY_SWR_0000350172-0001305766	Responsive Microsoft Search Warrant Returns (21 Mag 9335)
SDNY_SWR_0001305767-0001305768	Responsive Apple Search Warrant Returns (21 Mag 9335)
SDNY_SWR_0001305769-0001305949	Responsive Google Search Warrant Returns (21 Mag 9335)

SDNY_SWR_0001305950-0001476215	Responsive Microsoft Search Warrant Returns (21 Mag 9335)
SDNY_SW_00000000005	Responsive Hwang iCloud Cellebrite Export – PDF and UFDR Format (Password: ACM2022)

- 2) Load-ready and native digital files obtained through consent search and search warrants executed on devices possessed by William Tomita. SDNY_WT_PROD001.

Bates Ranges	Producing Party
SDNY_WT_0000000001-0000028207	William Tomita iPhone XS (Serial C39YM156KPFV) Files
SDNY_WT_0000028208-0000073353	William Tomita iPad Pro (Serial DMPWJ463HP50) Files
SDNY_WT_0000073354-0000092715	William Tomita iPhone 11 Pro (Serial C39CV5J1N6XW) Files
SDNY_SW_00000000001	William Tomita iPad Pro (Serial DMPWJ463HP50) Cellebrite Report
SDNY_SW_00000000002	William Tomita iPhone 11 Pro (Serial C39CV5J1N6XW) Cellebrite Report
SDNY_SW_00000000003	William Tomita iPhone XS (Serial C39YM156KPFV) Cellebrite Report
SDNY_SW_00000000004	William Tomita – Grace and Mercy iPhone (Serial DX3FP03J0DXW) Responsive Cellebrite Report

- 3) Supplemental subpoena returns and materials obtained from civil regulators, including cover letters. SDNY_P003_PROD001, SDNY_P004_PROD001.

Bates Ranges	Producing Party
SDNY_P003_0000000001-0000000544, SDNY_P004_0000000001-0000000013	Cover Letters and Other Supporting Documentation from Various Producing Parties Provided to the U.S. Securities and Exchange Commission (“SEC”) and U.S. Commodity Futures Trading Commission (“CFTC”)
SDNY_P004_0000000014-0000003262	Documents Produced by Archegos
SDNY_P004_0000003263	Documents Produced by Joshua Chuang
SDNY_P004_0000003264	Documents Produced by Sterling Clay
SDNY_P004_0000003265-0000003272	Documents Produced by Deutsche Bank
SDNY_P004_0000003273	Documents Produced by Jensen Ko
SDNY_P004_0000003274-0000003276	Documents Produced by Nomura
SDNY_P004_0000003277	Documents Produced by David Park
SDNY_P004_0000003278-0000125763	Documents Produced by Archegos

SDNY_P004_0000125764-0000125767	Documents Produced by Caroline Swenson
SDNY_P004_0000125768-0000125785	Documents Produced by Felicity Tan
SDNY_P004_0000125786	Documents Produced by UBS
SDNY_P004_0000125787-0000125865	Documents Produced by BMO
SDNY_P004_0000125866-0000131906	Documents Produced by Bank of America
SDNY_P004_0000131907-0000133648	Documents Produced by Caroline Swenson
SDNY_P004_0000133649-0000133803	Documents Produced by Deutsche Bank
SDNY_P004_0000133804-0000136726	Documents Produced by David Eun
SDNY_P004_0000136727-0000308684	Documents Produced by Grace and Mercy
SDNY_P004_0000308685-0000371900	Documents Produced by Goldman Sachs
SDNY_P004_0000371901-0000428906	Documents Produced by Jefferies
SDNY_P004_0000428907-0000431046	Documents Produced by Mizuho
SDNY_P004_0000431047-0000435393	Documents Produced by Morgan Stanley
SDNY_P004_0000435394-0000435395	Documents Produced by Nomura
SDNY_P004_0000435396-0000436003	Documents Produced by Morgan Stanley
SDNY_P004_0000436004-0000446621	Documents Produced by Teng Yue Partners
SDNY_P004_0000446622-0000447658	Documents Produced by UBS

4) Native electronic materials from various sources. SDNY_003.

Bates Ranges	Producing Party
SDNY_003_00000001	ACM March 2021 Combo Sheet, obtained by SEC (password: perf)
SDNY_003_00000002-00000004	Trading records relating to certain individual ACM employees, obtained by SEC
SDNY_003_00000005-00000022	ACM Letter to SEC dated April 8, 2021, describing Axeo system production values
SDNY_003_00000005-00000022	March 24, 2021 Bloomberg Chat, between Halligan and Becker, obtained by SEC
SDNY_003_00000023-00000055	Hard Copy Documents from Search of Becker's Residence
SDNY_003_00000056-00000710	Cover Letters, Custodian of Records Certifications, and Other Supporting Documentation

Please let us know if you encounter difficulty in accessing the files.

Very truly yours,

DAMIAN WILLIAMS
United States Attorney

by:



Andrew Thomas
Matthew Podolsky
Alex Rossmiller
Assistant United States Attorneys
(212) 637-2106 / 1947 / 2415